

The Honorable Benjamin H. Settle

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA, for the Use
and Benefit of CECCANTI, INC., a
Washington corporation,

Plaintiffs,

v.

HARTFORD FIRE INSURANCE
COMPANY, a Connecticut corporation,

Defendant.

Case No. 3:22-cv-05103-BHS

STIPULATED MOTION TO STAY
ACTION

**NOTE ON MOTION CALENDAR:
WEDNESDAY, FEBRUARY 1, 2023**

I. STIPULATED MOTION

Plaintiff Ceccanti, Inc. ("**Ceccanti**") and Defendant Hartford Fire Insurance Company ("**Hartford**") (collectively, the "**Parties**"), by and through their respective counsel, stipulate and respectfully request the Court enter an order staying this action.

Ceccanti and the general contractor for the project at issue in this action, Doyon Project Services, LLC ("**Doyon**"), have agreed to present and pursue Ceccanti's claim against the owner of the project, the U.S. Navy. As such, the Parties agree it is most economical for the action to be stayed in the interim, and propose that the Parties submit a joint status report to the Court on or before September 29, 2023.

A proposed order for the Court's review and signature is stated below.

1 DATED: February 2, 2023

2 ASHBAUGH BEAL, LLP

SEYFARTH SHAW LLP

3 By: s/ Richard H. Skalbania

By: s/ Ashley J. Sherwood

4 Richard H. Skalbania, WSBA #17316
5 rskalbania@ashbaughbeal.com
6 James Grossman, WSBA #55843
7 jgrossman@ashbaughbeal.com
8 701 5th Avenue, Suite 4400
9 Seattle, WA 98104

Ashley J. Sherwood, WSBA # 46885
asherwood@seyfarth.com
Ryan M. Gilchrist, WSBA # 50629
rgilchrist@seyfarth.com
999 Third Avenue, Suite 4700
Seattle, WA 98104

10 *Attorneys for Plaintiff Ceccanti, Inc.*

*Attorneys for Defendant Hartford Fire
Insurance Company*

11 **II. ORDER**

12 Based on the foregoing, IT IS SO ORDERED that this action is hereby stayed.

13 The Clerk of the Court shall strike the currently scheduled trial date of May 2, 2023 and
14 all pre-trial deadlines. The Parties shall submit a joint status report to the Court on or before
15 September 29, 2023.

16 DATED this 2nd day of February, 2023.

17
18
19 

20 BENJAMIN H. SETTLE
21 United States District Judge
22
23
24
25
26

1 Presented by:

2 ASHBAUGH BEAL, LLP

SEYFARTH SHAW LLP

3
4 By: s/ Richard H. Skalbania

5 Richard H. Skalbania, WSBA #17316
6 rskalbania@ashbaughbeal.com
7 James Grossman, WSBA #55843
8 jgrossman@ashbaughbeal.com
9 701 5th Avenue, Suite 4400
10 Seattle, WA 98104

11 *Attorneys for Plaintiff Ceccanti, Inc.*

By: s/ Ashley J. Sherwood

Ashley J. Sherwood, WSBA # 46885
asherwood@seyfarth.com
Ryan M. Gilchrist, WSBA # 50629
rgilchrist@seyfarth.com
999 Third Avenue, Suite 4700
Seattle, WA 98104

*Attorneys for Defendant Hartford Fire
Insurance Company*

CERTIFICATE OF SERVICE

I hereby certify that on the date below, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Attorneys for Plaintiff:

Richard H. Skalbania, WSBA No. 17316
James Grossman, WSBA No. 55843
Ashbaugh Beal LLP
701 5th Avenue, Suite 4400
Seattle, Washington 98104
Email: rskalbania@ashbaughbeal.com
Email: jgrossman@ashbaughbeal.com
Email: sthomas@ashbaughbeal.com

DATED this 1st day of February, 2023.

s/ Paul B. Mora
Paul B. Mora, Legal Assistant
Seyfarth Shaw LLP
999 Third Avenue, Suite 4700
Seattle, Washington 98104
(206) 946-4910
Email: pmora@seyfarth.com